

LETTER OF INQUIRY

6 March 2007

Fair Political Practices Commission
428 J Street, Suite 800
Sacramento, Calif. 95814

Attn: John W. Wallace
Cc: Chmn. Ross Johnson

RECEIVED
AIR POLITICAL
PRACTICES COMMISSION
2007 MAR -8 AM 11:30

Re: Officeholder Accounts/Reg. 18531.63 and .64

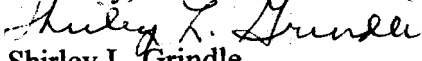
Dear Mr. Wallace:

I have received the Staff Report concerning the proposed changes to the above listed Regulations and I have some questions. I am most concerned with these areas:

1. What is the contribution limit per year for contributions made to an Officeholder Account?
2. Is a contribution to an Officeholder Account aggregated with campaign contributions made by the same contributor to 1) the prior election cycle in which the officeholder was elected to office, or 2) the next election cycle to run for that same office, or 3) to a future election cycle for a different elective state office (and what happens if an officeholder is not running for a different elective state office – what are his officeholder contributions aggregated with in that case)?
3. The Staff Report on page 4 states that officeholder funds may be carried over *without attribution* for a future term to the same elective office; it also states that this is covered by Reg. 18531.64. First of all, why is attribution not required? Doesn't that make it impossible to determine if the contribution limits have been adhered to? Also, I find no wording in the regulation (see (b)(2) of the regulation) that says you can do this without attribution although the Staff Report states there is such wording.
4. Is there a conflict between Reg. 18531.63 and Reg. 18531.64 with regard to cumulating officeholder contributions with campaign contributions? The Staff Report (p. 2 – next to last paragraph dealing with the cumulation rule AND p. 4 – first paragraph dealing with redesignation) seem to be conflicting.

It is not necessary for you to respond in writing to me – I'm sure these questions can be resolved over the phone if you prefer.

Sincerely,


Shirley L. Grindle

5021 E. Glen Arran, Orange, Calif. 92869
(714) 633-0851